

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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<u>PEDRO BAEZ-TORRES,</u>)	
)	
)	Petitioner,
)	
v.)	
)	
UNITED STATES OF AMERICA,)	Case Number:
)	3:13-cr-00702-GAG
)	
<u>Respondent.</u>)	

MOTION FOR APPOINTMENT OF COUNSEL
FOR COMPASSIONATE RELEASE

COMES NOW, Pedro Baez-Torres (the "Petitioner"), respectfully requesting appointment of counsel (pursuant to 28 U.S.C. § 1015) to assist with the preparation of a PETITION FOR COMPASSIONATE RELEASE pursuant to 18 U.S.C. § 3582(c)(1)(A)(i).

The Petitioner previously requested this honorable Court assign him an attorney to assist with the filing of a Compassionate Release Motion. It was replied on 7/21/2020 stating "Defendant should first place the Court in a position to understand that the relief sought is plausibly meritorious." Since receiving that reply, Baez-Torres has fulfilled his due diligence in pursuing a Compassionate Release through the Warden of FCI Fort Dix, where he is confined. The letter to the warden was sent on July 7, 2020. See a copy attached as APPENDIX 1. The warden denied the Petitioner's request on July 31, 2020. See APPENDIX 2. The Administrative Remedy process was followed by filing a BP-9 on August 19, 2020. See APPENDIX 3. The Warden again denied the request on October 6, 2020 because the Petitioner's request does not fall within one of the BOP recognized categories (which have not been updated to reflect the extraordinary and

compelling reasons such as COVID-19). See APPENDIX 4.

The Petitioner clearly describes his unique circumstances including having a heart condition and asthma. See APPENDIX 5. The attached appendices "put the Court in a position to understand what these conditions are."

Because Baez-Torres speaks English as a second language and is a layman of the law, the ends of justice would best be served in this case if an attorney was appointed to represent the Petitioner.

Respectfully submitted,



Pedro Baez-Torres
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Date: November 15, 2020